

Marie-Ann Greenberg, MAG-1284  
Marie-Ann Greenberg, Standing Trustee  
30 TWO BRIDGES ROAD  
SUITE 330  
FAIRFIELD, NJ 07004-1550  
973-227-2840  
Attorney for the Standing Trustee

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IN RE:  
KENNETH WELCH  
SONJA WELCH

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SHMUEL KLEIN  
113 CEDARHILL AVENUE  
LAW OFFICE OF SHMUEL KLEIN PC  
MAHWAH, NJ 07430

KENNETH WELCH  
SONJA WELCH  
PO BOX 1700  
MONTAGUE, NJ 07827

PLEASE TAKE NOTICE, that on 04/22/2009 at 9:00 am in the forenoon or as soon thereafter that counsel may be heard, the undersigned, as attorney for Marie-Ann Greenberg, Standing Trustee will move before Honorable Judge DONALD H. STECKROTH, at US Bankruptcy Court, 50 Walnut Street, Third Floor, B, Newark, NJ 07102, for an Order Dismissing the Debtor(s) Voluntary Petition for relief under Chapter 13 for failure to make timely payments.

The undersigned will rely on the attached Certification in support of this motion plus an oral report updating the information on the return date of this motion.

Marie-Ann Greenberg, Esquire  
Standing Chapter 13 Trustee

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Case No.: 08-28110S**

**NOTICE OF MOTION TO DISMISS PEITION**

**HEARING DATE: 4/22/2009**

**ORAL ARGUMENT REQUESTED**

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**CERTIFICATION IN SUPPORT OF MOTION**

I, Jackie Michaels, being of full age certify that:

1. I am an administrator for Marie-Ann Greenberg, Standing Trustee, and am familiar with the facts of this case.
2. The secured creditor has obtained an Order Vacating the Automatic Stay.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, that I am subject to punishment.

Dated: March 31, 2009

By: /S/ Jackie Michaels

Jackie Michaels  
Administrator

Marie-Ann Greenberg, MAG-1284  
Marie-Ann Greenberg, Standing Trustee  
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**CERTIFICATE OF SERVICE**

On March 31, 2009, the undersigned served to SHMUEL KLEIN and KENNETH WELCH and SONJA WELCH a copy of the within Notice of Motion.

Notice of Motion was served via US Mail or electronically via ECF.

Dated: March 31, 2009

By: /S/ Jackie Michaels

Jackie Michaels  
Administrator